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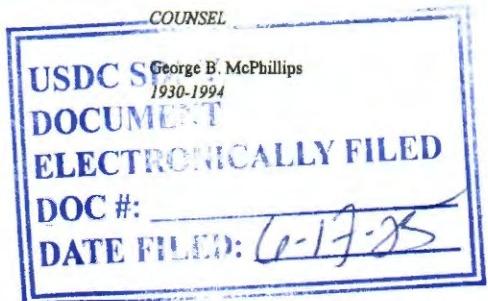
Andrew J. Campanelli
Member of NY Bar

Jean M. Smyth
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June 16, 2025

Via ECF

Honorable Lewis A. Kaplan
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007



Re: Bayley v. City of New York, et al.
Docket # 25-cv-00943 (LAK)

Dear Judge Kaplan:

My Firm represents the plaintiff in the above-referenced matter. I respectfully submit this letter as a request for a one-week extension of time to disclose our expert witnesses.

Our initial disclosure of expert witnesses is due today 6/16/2025. I have called and emailed opposing counsel today asking for consent to an extension, but I have been unable to get in touch, due to no fault of defense counsel as it is short notice. The expert my firm has previously used has retired, necessitating a longer process than anticipated in securing a new expert witness. This is the plaintiffs first request for an extension in this matter.

I thank the court for its consideration of this request.

Respectfully submitted,

/s/ Philip A. Salmon
Philip A. Salmon

cc: All parties via ECF

Grant Gid
 SO ORDERED
Lewis A. Kaplan, USDC
 6/16/25